

ORIGINAL

cc: jms  
KENJI M. PRICE #10523  
United States Attorney  
District of Hawaii

MARSHALL H. SILVERBERG #5111  
Assistant U.S. Attorney  
Room 6-100, PJKK Federal Building  
300 Ala Moana Boulevard  
Honolulu, Hawaii 96850  
Telephone: (808) 541-2850  
Facsimile: (808) 541-2958  
Email: [Marshall.Silverberg@usdoj.gov](mailto:Marshall.Silverberg@usdoj.gov)

FILED IN THE  
UNITED STATES DISTRICT COURT  
DISTRICT OF HAWAII

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Attorneys for Plaintiff  
UNITED STATES OF AMERICA

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,	)	CR. NO. 18-00059 JMS
	)	
Plaintiff,	)	FIRST SUPERSEDING
	)	INDICTMENT
vs.	)	
	)	[18 U.S.C. §§ 1544 and 1542]
PETER CHRISTOPHER,	)	
	)	
Defendant.	)	
_____	)	

**FIRST SUPERSEDING INDICTMENT**

The Grand Jury charges that:

**COUNT 1**

**Wrongful Furnishing of Another's Passport  
(18 U.S.C. § 1544)**

On or about November 13, 2010, in the District of Hawaii and elsewhere, PETER CHRISTOPHER, the defendant, willfully and knowingly furnished United States passport number 455112078, issued and designed for the use of one of his daughters, a minor child whose initials are R.M.C., to another of his daughters, a minor child whose initials are G.G.C.S., for the use of G.G.C.S., well knowing that G.G.C.S. was not the person for whose use said passport was originally issued and designed.

All in violation of Title 18, United States Code, Section 1544.

**COUNT 2**

**False Statement in a Passport Application  
(18 U.S.C. § 1542)**

On or about April 1, 2016, in the District of Hawaii, PETER CHRISTOPHER, the defendant, willfully and knowingly made false statements in an application for a passport with intent to induce and secure for the use of another, namely his daughter, whose initials are G.G.C.S., the issuance of a passport under the authority of the United States, contrary to the laws regulating the issuance of such passports and the rules prescribed pursuant to such laws, in that in such


application, Form DS-11, and in other State Department Forms relating to such application, including Forms DS-64, DS-5525, and a DS-5525 Continuation form, the defendant falsely stated: (1) that G.G.C.S.'s United States passport, number 433048982, had been lost; (2) that he did not remember how G.G.C.S.'s United States passport had been lost; (3) that he did not know where the loss of G.G.C.S.'s United States passport had occurred, and (4) that the reason G.G.C.S. came to the United States in 2010 was that her mother had ceased to fulfill her obligations to care for G.G.C.S., instead leaving her with other family members who ultimately proposed to the defendant that G.G.C.S. move with him permanently to the United States, which statements the defendant knew to be false.

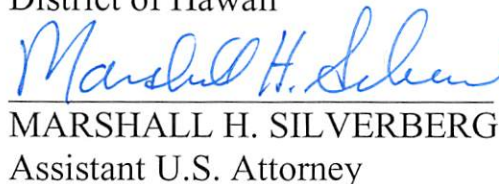
All in violation of Title 18, United States Code, Section 1542.

Dated: June 7, 2018, at Honolulu, Hawaii.

A TRUE BILL

/s/ Foreperson, Grand Jury  
FOREPERSON, GRAND JURY

  
KENJI M. PRICE  
United States Attorney  
District of Hawaii

  
MARSHALL H. SILVERBERG  
Assistant U.S. Attorney

United States v. Peter Christopher,  
Cr. No. 18-00059 JMS ("First Superseding Indictment")